

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

November 9, 2024

Nathan Ochsner, Clerk of Court

United States of America

v.

Major Walker
and
Braylon Hunt

Case No.

4:24-mj-487

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/08/2024 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC §§ 1951 and 2
18 USC §§ 924(c)(1)(A) and 2

Offense Description

Aiding and abetting interference with commerce by robbery
Aiding and abetting brandishing a firearm during and in relation to a crime of
violence

This criminal complaint is based on these facts:

See attached affidavit in support of application

☒ Continued on the attached sheet.


Complainant's signature

Andrew Thompson Special Agent, ATF

Printed name and title

Attested to by the applicant by having been sworn telephonically.

Date: 11/09/2024


Judge's signature

City and state: Houston, Texas

Richard W. Bennett, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Andrew Thompson, being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since October 2021. I am presently a member of ATF Houston Crime Gun Strike Force. As a Special Agent of the ATF, my duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly interference with commerce by robbery (Hobbs Act) and violent criminals.

2. After graduating high school in 2007, I spent four years in the United States Marine Corps., where I was an infantryman. I graduated of Texas State University in 2015 with a bachelor’s degree in criminal justice. I was employed by the Houston Police Department (“HPD”) for five years, from 2016 to 2021. While at the Houston Police Department, I was assigned to a divisional gang unit and I was a homicide detective. I graduated from the Federal Law Enforcement Training Center and the ATF National Academy in Glynco, Georgia in 2022.

3. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers and witnesses. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth every fact learned during the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

4. As detailed below, I received information from ATF Task Force Officer Jeremy Curtis regarding the Hobbs Act commercial robbery that occurred on November 8th, 2024, in

Houston, Texas, Southern District of Texas. The suspects were later identified as BRAYLON HUNT (DOB 05/16/2003) and MAJOR WALKER (DOB 12/03/2001). HUNT and WALKER are believed to be in violation of 18 U.S.C. § 1951 (interference with commerce by robbery) and 18 U.S.C. § 924(C)(1)(A) (brandishing a firearm during and in relation to a crime of violence).

PROBABLE CAUSE

5. HPD Robbery Detective and ATF Task Force Officer (“TFO”) Jeremy Curtis has been investigating seven robberies of cellphone business that occurred between September 15th and October 18th, 2024. These robberies have HPD incident numbers 1308827-24, 1408432-24, 1414956-24, 1427311-24, 1455416-24, 1455529-24, and 1457380-24.

6. Through research and multiple license plate reading systems, including FLOCK ALPR, law enforcement determined that a White Lincoln MKZ was involved in multiple of these robberies. The vehicle had a Texas paper license plate of “6480H81” and was registered MAJOR WALKER (DOB 12/03/2001, SPN #03122469). Investigation further revealed that WALKER had an arrest from a previous home invasion that occurred on 06/21/2023 under HPD case #882388-23. WALKER’s codefendants in that case were Tremont King (DOB 07/26/2001) and Kevin Jackson (DOB 04/20/1997).

7. On October 18, 2024, there was another robbery of an AT&T store located at 7811 Main St., Houston TX which involved the Lincoln MKZ. Law enforcement from the Tactical Surveillance Team (“TST”) conducted surveillance of the vehicle shortly after the robbery. TST followed the vehicle to the 4200 block of Stassen St in Houston, Texas where they observed WALKER place a rear license plate back onto the back of the Lincoln MKZ. Law enforcement then observed Tremont King arrive in a separate white SUV. Traffic stops were conducted on both vehicles, and WALKER and King were taken into custody for their open municipality warrants.

WALKER's vehicle was towed to the HPD vehicle examination building for processing. Both suspects were taken to ATF Houston where they were interviewed. Both denied involvement in any robberies, and they were later released.

8. On Thursday November 7, 2024, there was a robbery of a Cricket Wireless store located at 1111 South Victory Dr. Members of the HPD Eastside Crime Suppression team were able to share still image and video surveillance of the incident. I learned that a single black male entered the business and robbed the location at gunpoint at approximately 10:07 a.m. The suspect ordered the complainant to the back of the room at gunpoint to get money from the safe. The suspect was able to steal multiple phones and approximately \$100 in cash. The suspect then got back into a black Chevrolet Malibu with no license plate. Through CCTV footage, law enforcement was able to determine that there was a passenger who stayed inside the vehicle at the time of the robbery. This incident is documented under HPD #1559775-16.

9. Utilizing the FLOCK ALPR system, law enforcement was able to determine that the black Chevrolet Malibu used in the November 7 robbery had a Texas paper license plate of 6616D66. That vehicle is registered to a BRAYLON HUNT, with a registered address of 10010 Cullen Boulevard in Houston, Texas.

10. On Friday November 8, 2024, at approximately 10:53 a.m., there was another robbery of a Cricket Wireless store located at 10531 S. Post Oak in Houston, Texas. Two black males entered the store, brandished a firearm, and stole approximately 16 cell phones and approximately \$95 dollars in cash. Although both suspects wore masks, obscuring their face, they both wore black slide sandals. The suspects were seen leaving the location in a black color Chevrolet sedan. This incident is documented under HPD incident #1564996-24.

11. Because of the similarities between the November 7 and November 8 incidents,

HPD TST went to the registered location of HUNT's black Chevrolet Malibu. TST unmarked units arrived at the location at approximately 12:00 p.m., and they observed HUNT's black Chevrolet Malibu leaving the complex. HPD TST, Texas Department of Public Safety Criminal Investigation Division, and ATF Special Agents then began conducting rolling surveillance on the suspect vehicle. The vehicle is observed driving across the city to the Westside of Houston/Alief area.

12. Unmarked units observed the vehicle stop at a gas station located at 12680 Beechnut St. Unmarked units observed WALKER get out of the vehicle and enter the store. He then exited the store and returned to the passenger seat of the vehicle. Shortly after, a grey 2014 Toyota bearing Texas License plate DWK-2810 parks at the gas station pumps nearby. The driver of the suspect vehicle, later determined to be HUNT, exits his vehicle with a backpack and gets into the passenger side of the grey Toyota. The backpack HUNT was carrying appeared to be full at the time.

13. After a few minutes, HUNT exits the grey Toyota and gets back into his black Chevrolet Malibu. The backpack at that time appeared to be empty and was carried with one hand at HUNT's side. Law enforcement followed the grey Toyota back to his house, which was only four minutes away. When Mr. Khoa Ly exited the vehicle, he was observed with multiple unopened cell phone boxes in his hand. Officers made contact with this male, later identified as Mr. Khoa Ly, and confirmed him to be in possession of multiple brand-new cell phones. Later investigation determined the cell phones that were recovered from Mr. Khoa Ly, matched the serial/IMEI numbers of the phones that were taken from the robbery before the arrest.

14. Because law enforcement believed that HUNT's vehicle was recently used in an aggravated robbery, law enforcement conducted a vehicle containment technique on HUNT's vehicle. HUNT was able to avoid being contained and began evading from multiple marked police

units. HPD then successfully conducted a Pursuit Intervention Technique (PIT) on the vehicle and prevented further evading. A felony traffic stop was conducted and both HUNT and WALKER were taken into custody without further incident.

15. At the time of the arrest, both WALKER and HUNTER were wearing black slide sandals similar to the sandals seen on the surveillance of the robbery before the arrest. A plain view search of the vehicle was conducted and a firearm was observed resting on the center console. At the time of the arrest, HUNT had \$2132 on his person (with 21 one-hundred dollar bills) and WALKER had \$1744 on his person (including 17 one-hundred dollar bills). No other searches of the car was conducted, and the vehicle was taken to the HPD vehicle examination building for forensics. WALKER, HUNT, and Mr. Khoa Ly were taken to ATF Houston for questioning.


16. Once at ATF Houston, Mr. Khoa Ly stated that he bought the stolen phones from HUNT and had been buying phones from HUNT for over a year. Mr. Khoa Ly stated that for the November 8, 2024 transactions, he paid HUNT \$3400 for the phones, in one-hundred dollar bills. Mr. Khoa Ly further stated that he purchased phones on the day prior, November 7, 2024, and paid HUNT \$400 in one-hundred dollar bills. Notably, the amount of money Mr. Khoa Ly gave HUNT on November 7 and November 8 (i.e., \$3,800) and the fact that he paid HUNT in one-hundred dollar bills is consistent with the amount of money found on HUNT and WALKER's persons at the time of arrest (i.e., a combined \$3,800 in one-hundred dollar bills).

17. Moreover, Mr. Khoa Ly allowed law enforcement to review text messages he exchanged with HUNT, including messages on November 7 and November 8, 2024. These messages included discussions of purchasing phones that matched the make and model of phones that were stolen at the robberies that occurred on November 7 and 8, 2024. Moreover, the timing of the messages occurred shortly after each of the robberies.

18. HUNT and WALKER were placed into the Houston Federal Detention Center on November 8, 2024 at approximately 11:45 p.m.


19. Cricket Wireless LLC is an American prepaid wireless service provider, wholly-owned by AT&T Inc. Cricket Wireless is headquartered in Atlanta, Georgia. Cricket Wireless stores provide wireless services to cellular subscribers and engage in the sale of cellular phones and accessories, which are shipped through and affect interstate commerce.

20. Based on the foregoing, I believe there is probable cause that on November 8, 2024 BRAYLON HUNT and MAJOR WALKER aided and abetted the interference with commerce by robbery, in violation of 18 U.S.C. §§ 1951 and 2, and aided and abetted the brandishing a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. §§ 924(C)(1)(A) and 2.


Special Agent Andrew Thompson

Bureau of Alcohol, Tobacco Firearms and Explosives

Sworn and subscribed to me by telephone on this the ninth day of November 2024, and I find probable cause


Richard Bennett, United States Magistrate Judge

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Major Walker

Case No. 4:24-mj-487

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Major Walker,

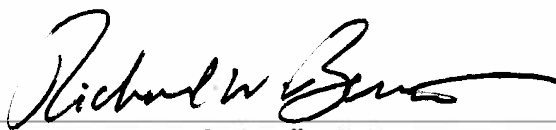
who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 USC §§ 1951 and 2 - Aiding and abetting interference with commerce by robbery

18 USC §§ 924(c)(1)(A) and 2 - Aiding and abetting brandishing a firearm during and in relation to a crime of violence

Date: 11/09/2024

*Issuing officer's signature*City and state: Houston, TexasRichard W. Bennett, United States Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

AO 442 (Rev. 11/11) Arrest Warrant (Page 2)

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (name, relation, address, phone number): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): _____

Date of last contact with pretrial services or probation officer (if applicable): _____

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Braylon Hunt

Case No. 4:24-mj-487

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

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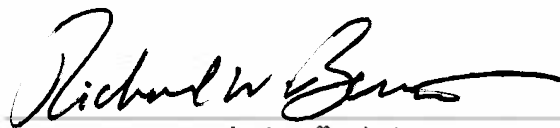
who is accused of an offense or violation based on the following document filed with the court:

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18 USC §§ 924(c)(1)(A) and 2 - Aiding and abetting brandishing a firearm during and in relation to a crime of violence

Date: 11/09/2024


Issuing officer's signature

City and state: Houston, Texas

Richard W. Bennett, United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

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